

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

*In re Flint Water Cases*

Case no. 5:16-cv-10444-JEL-MKM  
(Consolidated)

Hon. Judith E. Levy

Mag. Mona K. Majzoub

**ORAL ARGUMENT REQUESTED**

**PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

Co-Liaison Counsel for Individual Plaintiffs and Interim Co-Lead Counsel for the Putative Class (collectively, "Plaintiffs") jointly move to compel disclosure of documents and investigative testimony (the "criminal investigative materials") sought pursuant to 1) a non-party subpoena served upon the Michigan Attorney General's office on July 25, 2019; and 2) requests for production propounded upon the MDEQ Defendants. Plaintiffs hereby move to compel the production of a comprehensive set of those materials by the Attorney General's Office, or at the very least, whatever documents from criminal discovery proceedings are in the possession of MDEQ Defendants.

For the reasons set forth in the attached supporting brief, Plaintiffs respectfully request that the motion to compel be granted.

Date: May 5, 2020

By: /s/ Renner K. Walker  
Renner K. Walker  
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**ON BEHALF OF INDIVIDUAL  
PLAINTIFFS**

Respectfully submitted,

By: /s/ Paul F. Novak  
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**ON BEHALF OF PUTATIVE CLASS  
PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I, Corey M. Stern, hereby certify that on May 5, 2020, the foregoing Plaintiffs' Motion to Compel Production of Documents was served electronically (via ECF) to all counsel of record.

Additionally, the foregoing Plaintiffs' Motion to Compel Production of Documents were served on the State of Michigan, Department of the Attorney General, a non-party, by emailing the foregoing papers to miag@michigan.gov.

*/s/ Corey M. Stern*  
Corey M. Stern